

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 26, 2011.

Permit Number: **R30-05300054-2011**

Applications Received: **September 25, 2013**

Plant Identification Number: **05300054**

Permittee: **M & G Polymers USA, LLC**

Mailing Address: **State Route 2, Apple Grove, WV 25502-0088**

Permit Action Number: *MM03* Revised: March 25, 2014

Physical Location:	Apple Grove, Mason County, West Virginia
UTM Coordinates:	397.861 km Easting • 4,279.973 km Northing • Zone 17
Directions:	Plant is located on WV Route 2 approximately thirteen (13) miles south of Point Pleasant and thirty (30) miles north of Huntington.

Facility Description

M & G Polymers manufactures polyester resin and handles the final product in bagging/package, storage, and loading facilities. Infrastructure and support facilities are also located at the site and include boilers, wastewater treatment, warehouses, maintenance shops, and laboratories.

This facility is operated under SIC Code 2821.

The changes in MM03 modification (based on recently issued pre-construction permit R13-1650R) are as follows:

- Take out of service the off-spec silo (L4B-F-0200) and dust collector (L4B-M-0200) thus eliminating emission point 4P-0200 in CP-4 production unit.
- Relocate the salvage silo (L11-F-1020) in production unit CSS-8 to the CP-4 unit thus replacing the off-spec silo (L4B-F-200). The salvage silo will be renamed the crystallizer blending silo (C4A-F-0411) and will vent through the existing CP-4 dust collector C4A-M-0340 and emission point 4P-0340.
- Vent the Plant's MACT tank (D-155) to the CP-4 Unit's hot oil heater, and

- Add a diesel-fueled emergency electric generator (DGM-U-1010) originally installed in 2005.

Emissions Summary

The changes in potential emissions associated with the minor modification (MM03) are as follows:

Pollutant	Potential to Emit (TPY)
NO _x	+0.83
PM	+0.03
CO	+0.07
VOC	+0.16
SO _x	+0.14
HAPs	+0.02

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 10 tons per year of ethylene glycol. Due to this facility's potential to emit over 10 tons per year of a single HAP, M & G Polymers USA, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Processes and Associated Operations
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40 C.F.R. 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
State Only:	None.	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1650R	December 10, 2013	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following Sections of the permit were revised to incorporate changes to permit R13-1650R:

- Emission Unit Table, 1.1 has been revised due to equipment changes approved under R13-1650R.
- The diesel-fueled emergency electric generator (DGM-U-1010) was originally installed in 2005 and is subject to 40CFR63, Subpart ZZZZ for an existing emergency CI RICE located at a major source of HAPs. Its requirements were included under existing condition 4.1.24 and new conditions 4.4.18, 4.5.6, and 4.5.7. In addition, the 40C.F.R. § 63.6640(f) requirements for emergency RICE in condition 4.1.24(j) were updated due to recent changes to 40CFR 63 Subpart ZZZZ on January 30, 2013.
- Emission Limits in section 4.1.11 were updated based on the R13-1650R changes. R13-1650R included emission limits for 3P-155, but since the MACT Tank's (D-155) emissions are now vented to the CP-4 Hot Oil Heater, these limits in Table 4.1.11.a were deleted.
- In sections 4.1.10, 4.1.11 and 4.1.15, emission points 4P-0200 and 8ECS5 were deleted. The emission points no longer exist.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

M & G Polymers' emergency generator engine is not subject to 40 C.F.R. 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) because it was constructed/installed in 2004/2005, too early to be covered by Subpart IIII.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Beena Modi

West Virginia Department of Environmental Protection

Division of Air Quality

601 57th Street SE

Charleston, WV 25304

Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

None